

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

BEFORE THE FEDERAL ELECTION COMMISSION

SEP 29 4 23 PM '95

In the Matter of

)  
)  
)

MUR 3774

AFFIDAVIT OF DAVID N. O'STEEN, PH.D.

This affidavit responds to the Federal Election Commission's SUBPOENA TO PRODUCE DOCUMENTS and the ORDER TO SUBMIT WRITTEN ANSWERS dated August 7, 1995 in MUR 3774. All of the answers herein are given to the best of my knowledge, recollection and belief.

Question 1. To the best of my knowledge, recollection and belief, the following present or former officers, employees, agents and/or volunteers of National Right to Life Committee, Inc. ("NRLC") had knowledge of donations to NRLC by the National Republican Senatorial Committee ("NRSC"):

Wanda Franz, Ph.D.  
President  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8800, Ext. 136 (O)

David N. O'Steen, Ph.D.  
Executive Director  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8814, Ext. 114 (O)

Darla L. St. Martin  
Associate Executive Director  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8826, Ext. 126 (O)

Joleigh Little  
Administrative Assistant  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8800, Ext. 153 (O)

Jacki Ragan  
Director (State Development and Conventions)  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8800, Ext. 127 (O)

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
OCT 2 9 56 AM '95

1100-266-40-02

Carol Long  
Director of NRL PAC  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8808, Ext. 115 (O)

Amarie C. Natividad  
Controller  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8816, Ext. 116 (O)

Geline B. Williams  
Chairman of the Board of Directors  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(804) 282 8422

Regina Smith  
Vice-Chairman of the Board of Directors  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8800 (O)

Anthony Lauinger  
Vice-President (June, 1995 - Present)  
Treasurer (June, 1991 - June, 1995)  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8800 (O)

Emma O'Steen  
Secretary  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8800 (O)

Irene Gatton  
Bookkeeper  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8800, Ext. 131

Dennis Day  
Treasurer (June, 1995 - Present)

419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8800

Marice Rosenberg  
Consultant  
966 Redwood Drive  
Apple Valley, MN 55124  
(612) 432-3753 (H)

Heather Clapsaddle  
Assistant to the PAC Director  
419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004  
(202) 626-8800, Ext. 138

Curt Anderson  
Consultant  
2707 Arden Forest Lane  
Bowie, MD 20716  
(301) 390-7848 (H)

Robert Powell, deceased.  
Vice-President

In addition to the above, there were others among the present or former officers, employees, agents and/or volunteers of NRLC who learned of such contributions after the complaint in this matter was filed.

Question 2. Because of the circumstances surrounding the solicitations and payments, it is impossible to link any particular solicitation of which I have personal knowledge with any particular payment. Therefore, I have answered this question by distinguishing between the solicitations and payments made in 1992 and those made in 1994.

The following answers refer to any solicitations and payments made in 1992:

a. To the best of my personal knowledge, recollection and belief, with respect to any solicitations by NRLC during 1992, I had several meetings during 1992 with Curt Anderson who was then Coalitions' Director with the NRSC. Darla St. Martin of the NRLC may also have been present at the meetings. As stated above, none of those meetings was linked specifically with any particular payment. Rather the substance of the meetings was a solicitation of funds to the NRLC's general fund for the general purposes of the organization.

In addition to the above-referenced meetings, there may have been telephone conversations with Curt Anderson to the same general effect, that is, generalized solicitations of funds for NRLC's general purposes.

b. In addition to Curt Anderson, Jeb Hensarling and Paul Curcio of NRSC were present during one or more solicitations and may also have been spoken with on the telephone.

c. The substance of the meetings was to solicit contributions in order to further the general purposes of the organization, such as building NRLC's base of support, adding to our list of identified pro-lifers, publishing candidate surveys and non-partisan get-out-the-vote efforts.

To the best of my personal knowledge, information and belief, some of the solicitations in which I was personally involved may have taken place on the following dates: January 28, 1992; February 25, 1992; April 2, 1992; and June 29, 1992. I have no information about or recollection of other dates.

I may have told someone at the NRSC that NRLC could possibly make a donation to Christian Coalition. However, I do not remember the date of any such communication or who I may have spoken with.

d. All contributions received in 1992 were deposited into the general 501(c)(4) bank account.

e. The funds were used for the general purposes of the organization, including non-partisan get-out-the-vote telephone calls. In addition, a portion of the November 17, 1992 contribution was donated to the Christian Coalition nationally and the Christian Coalition in Georgia.

In 1992, the following amounts were expended for the following purposes. \$17,372.75 was spent on non-partisan get-out-the-vote phone calls in Georgia. \$15,000.00 was donated to the national Christian Coalition. \$10,000.00 was donated to the Christian Coalition in Georgia.

I was involved in deciding how to use the funds. Carol Long and/or Darla St. Martin may also have been involved in deciding how to use the funds.

The decision as to the use of the funds was based on organizational need and the desire to educate the voters on the issues and urge their participation in the election.

f. I have no other recollection whether any officer, employee, agent or volunteer of the NRLC directly or indirectly

informed any officer, employee, agent or volunteer of the NRSC of any decision regarding the use of any payment.

The following answers refer to any solicitations and payments made in 1994:

a. In 1993 and/or 1994, I had one or more meetings with Bill Harris and Paul Curcio of the NRSC, at which I solicited contributions to NRLC. Carol Long and/or Darla St. Martin may also have attended such meetings or made telephone solicitations. In 1993 and 1994, Curt Anderson was working as a fund-raising consultant for NRLC and also solicited contributions on our behalf.

b. As stated above, in 1994, solicitations were made to Bill Harris and Paul Curcio of the NRSC.

c. One such meeting may have occurred on March 18, 1993. I have no recollection of other dates of any meetings in which such solicitations may have occurred. There may have been one or more meetings initiated by NRLC. The substance of such meetings was NRLC's desire to raise funds for all of its general purposes, including building NRLC's base of support, adding to our list of identified pro-lifers, publishing candidate surveys and non-partisan voter guides, and non-partisan get-out-the-vote efforts.

d. All contributions received in 1994 were deposited into the general 501(c)(4) bank account.

e. Any contributions from NRSC to NRLC in 1994 were used for the general purposes of NRLC as set forth above. I made the decisions regarding the use of such contributions in conjunction with Darla St. Martin and Carol Long.

The decision as to the use of the funds was based on organizational need and the desire to educate the voters on the issues and urge their participation in the election.

f. I have no recollection whether any officer, employee, agent or volunteer of the NRLC directly or indirectly informed any officer, employee, agent or volunteer of the NRSC of any decision regarding the use of any payment in 1994.

Question 3.

The following documents relate to or reference the payments listed in Question 2:

a. Checks, check stubs and/or cover letters evidencing the contributions by NRSC to NRLC on the following dates: October 2, 1992; October 20, 1992; November 17, 1992; October 31, 1994;

November 1, 1994; November 3, 1994; November 4, 1994; attached hereto as Exhibit A.

b. NRLC's Bank statements with respect to Signet Bank, Accounts #6670042008 and #6670042040 the following months: October and November, 1992; and October, November and December, 1994, attached hereto as Exhibit B.

Question 4.

a. No transfers of funds, contributions or other disbursements were made by NRLC to Minnesota Citizens Concerned for Life, Inc. between October 1, 1992 and January 1, 1993.

b. No transfers of funds, contributions or other disbursements were made by NRLC to National Right to Life PAC or Minnesota Citizens Concerned for Life Committee For a Pro-Life Congress between October 1, 1992 and January 1, 1993.

c. NRLC made a \$50,000 contribution to Minnesota Citizens Concerned for Life, Inc. on November 4, 1994. \$5,000 of this was treated as a loan and repaid by MCCL on December 6, 1994. NRLC made contributions of \$35,000.00 and \$17,000.00 to Oregon Right to Life, on October 4, 1994 and November 7, 1994, respectively. NRLC made a contribution of \$3,000.00 to New Jersey Committee for Life on October 17, 1994. NRLC made a contribution of \$5,000.00 to the California Pro-Life Council on November 7, 1994.

Attached hereto as Exhibit C are copies of checks and/or check request forms relating to the above-referenced contributions.

The purposes of the above contributions were to aid the general activities of these organizations including non-partisan voter education and non-partisan get-out-the-vote activities, and in Oregon, activities related to an initiative to legalize assisted suicide.

NRLC made no transfers of funds, contributions or other disbursements to the Pennsylvania Pro-life Federation, Inc. between October 1, 1994 and January 1, 1995.

d. No transfers of funds, contributions or other disbursements were made by NRLC to National Right to Life PAC, Minnesota Citizens Concerned for Life Committee for a Pro-life Congress of the Pennsylvania Pro-life Federation PAC between October 1, 1994 and January 1, 1995.

Question 5.

Of all of the types of activities listed in Question 5, NRLC expended funds only on non-partisan get-out-the-vote telephone calls in connection with the November 24, 1992 U.S. Senate run-off election in Georgia. The total amount expended by NRLC in such activities was \$17,372.75.

Question 6.

Of all of the types of activities listed in Question 6, NRLC expended funds only on non-partisan get-out-the-vote telephone calls in connection with the 1994 general election in Minnesota and Pennsylvania. The total amount expended in Minnesota for such activities was \$50,000. The total amount expended in Pennsylvania for such activities was \$63,544.20.

Question 7.

The following documents relate to or reference the payments listed in Questions 5 and 6:

a. Copies of phone scripts used in non-partisan get-out-the-vote telephone calls in the following elections: the 1992 Georgia Senate run-off election; the 1994 general election in Pennsylvania and the 1994 general election in Minnesota; attached hereto as Exhibit D.

b. Copies of a check and a check request form which relate to non-partisan get-out-the-vote telephone calls in the 1994 Minnesota general election attached hereto as Exhibit E.

c. Copies of checks, check request forms, invoices and letters which relate to non-partisan get-out-the-vote telephone calls in the 1994 Pennsylvania general election attached hereto as Exhibit F.

d. Copies of a check and invoice which relate to non-partisan get-out-the-vote telephone calls in the 1992 Georgia Senate run-off election attached hereto as Exhibit G.

e. NRLC's Bank statements with respect to Signet Bank, Account #6670042008 for the following months: October and November, 1992; and October, November and December, 1994, attached hereto as Exhibit B.

Question 8.

To the best of my knowledge, recollection and belief, no materials were distributed by or on behalf of NRLC in the 1992 general election run-off for U.S. Senate in Georgia.

Question 9.

To the best of my knowledge, recollection and belief, no materials were distributed by or on behalf of NRLC in connection with the 1994 general election in Minnesota or Pennsylvania.

Question 10.

Attached hereto as Exhibit H are copies of NRLC's tax return Forms 990 for 1992 and 1994.

Question 11.

NRLC does not publish an annual report.

Question 12.

To the best of my knowledge, recollection and belief, I am not aware of any officers, employees, agents, or volunteers of NRLC who acted in any of those capacities for the NRSC, the Coverdell for Senate Committee, Santorum '94, or the Rod Grams for U.S. Senate Committee.

Question 13.

To the best of my knowledge, recollection and belief, no materials were distributed by or on behalf of NRLC in Georgia which referenced the 1992 general election run-off, or in Pennsylvania or Minnesota that referenced the 1994 general election.

Question 14.

The following individuals have knowledge of get-out-the-vote activities conducted by or on behalf of NRLC in Georgia in connection with the 1992 general election run-off, and/or in Pennsylvania or Minnesota in connection with the 1994 general election.

- a. David O'Steen, Ph. D., Executive Director.
- b. Darla L. St. Martin, Associate Executive Director.
- c. Carol Long, Director of NRL PAC.
- d. Jacki Ragan, Director (State Development and Conventions).
- e. Marice Rosenberg, Consultant.
- f. Amarie Natividad, Controller.
- g. Irene Gatton, Bookkeeper.
- h. Kel Macdonald, Volunteer.



I. Joleigh Little, Administrative Assistant.

j. Heather Clapsaddle, Assistant to the PAC Director.

In addition to the above, there were others among the present or former officers, employees, agents and/or volunteers of NRLC who learned of such activities after the complaint in this matter was filed.

Attached hereto as Exhibit I are the addresses of Paul Curcio, Bill Harris, and Jeb Hensarling.

I, David N. O'Steen, being duly sworn, make the statements contained in this affidavit to the best of my personal knowledge, information and belief, under penalty of perjury.

David N. O'Steen  
David N. O'Steen, Ph.D.

9/29, 1995

DISTRICT OF COLUMBIA    )  
                                  :  
CITY OF WASHINGTON        )

Before me, a Notary Public in and for said City and District, personally appeared David N. O'Steen, and acknowledged the execution of the foregoing instrument and made oath that the information provided therein was made to the best of his personal knowledge, information and belief, and, where based on information and belief, he believes the information to be true.

Witness my hand and notarial seal this 29th day of

SEPTEMBER, 1995.

My commission Expires:

Irene M. Galton  
Notary Public, District of Columbia  
My Commission Expires May 14 1998, 19\_\_.

Irene M. Galton 9-29-95  
NOTARY PUBLIC

EXHIBIT A

Affidavit of  
David O'Steen

# NATIONAL REPUBLICAN SENATORIAL COMMITTEE

NON-FEDERAL EXPENDITURES  
425 2ND ST., NE.  
WASHINGTON, DC 20002

1170

SIGNET BANK  
Virginia  
Phone, VA

WASHINGTON, DC 20002

OCTOBER 2 1992

88-408/560 1411

PAY \*\*TWENTY FIVE THOUSAND AND 00/100\*\*\*\*\* DOLLARS \$ \*\*25,000.00\*\*

TO  
THE  
ORDER  
OF  
NATIONAL RIGHT TO LIFE COMMITTEE  
419 7TH STREET NW, SUITE 500  
WASHINGTON, DC 20004

*John J. Henshaw*  
*James V. Henshaw*

⑆00001170⑆ ⑆056004089⑆ 652⑆01699⑆

NATIONAL REPUBLICAN  
SENATORIAL COMMITTEE  
NON-FEDERAL EXPENDITURES

DETACH AND RETAIN THIS STATEMENT  
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW  
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DELUXE - FORM WVCP-2 V-2

DATE	DESCRIPTION	AMOUNT
10/2/92	PARTY DEVELOPMENT 02-7810 -- 25,000.00	25,000.00

*Committee - Pls. keep this w/ Fred.*  
*55-510-*

# National Republican Senatorial Committee

SENATOR PHIL GRAMM  
CHAIRMAN

JEB HENSARLING  
EXECUTIVE DIRECTOR

October 2, 1992

Mr. David O'Steen  
National Right to Life Committee  
419 7th Street N.W., Suite 500  
Washington, D.C. 20004

Dear David,

Enclosed please find a \$25,000 contribution from the National Republican Senatorial Committee for your Good Government Activities to be used in a manner consistent with your charter. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

We wish you luck in all your endeavors.

Sincerely,



Paul Curcio

Director of Political Services

# National Republican Senatorial Committee

A - 2

SENATOR PHIL GRAMM  
CHAIRMAN

JEB HENSARLING  
EXECUTIVE DIRECTOR

October 20, 1992

Mr. David O'Steen  
National Right to Life Committee  
419 7th Street N.W., Suite 500  
Washington, D.C. 20004

Dear David,

I am happy to send you a \$15,000 contribution from the National Republican Senatorial Committee for your Good Government Activities to be used in a manner consistent with your charter. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

Once again, we are happy to provide this support, and we wish you luck in all your endeavors.

Sincerely,



Paul Curcio  
Director of Political Services

NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE

NON-FEDERAL EXPENDITURES  
425 2ND ST., NE.  
WASHINGTON, DC 20002

**SIGNET BANK**  
Virginia, VA

1181

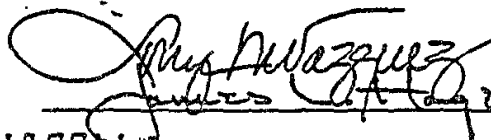
OCTOBER 20 19 92

88-408/580 1411

PAY \*\*FIFTEEN THOUSAND AND 00/100\*\*\*\*\* DOLLARS \$ \*\*15,000.00\*\*

TO  
THE  
ORDER  
OF

NATIONAL RIGHT TO LIFE COMMITTEE  
419 7TH STREET NW, SUITE 500  
WASHINGTON, DC 20004



00001166 0560040890 6520016991

# National Republican Senatorial Committee

SENATOR PHIL GRAMM  
CHAIRMAN

JEB HENSARLING  
EXECUTIVE DIRECTOR

November 17, 1992

Mr. David O'Steen  
National Right to Life Committee  
419 7th Street N.W., Suite 500  
Washington, D.C. 20004

Dear David,

I am happy to send you a \$45,000 contribution from the National Republican Senatorial Committee for your Good Government Activities to be used in a manner consistent with your charter. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

We are happy to provide this support, and we wish you luck in all your endeavors.

Sincerely,



Paul Curcio  
Director of Political Services

RONALD REAGAN REPUBLICAN CENTER  
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

NATIONAL REPUBLICAN  
SENATORIAL COMMITTEE  
NON-FEDERAL EXPENDITURES

DETACH AND RETAIN THIS STATEMENT  
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.  
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO RECEIPT DESIRED.

DELUXE - FORM WVCP-2 V-2

DATE	DESCRIPTION	AMOUNT
11/17/92	TRANSFER 02-7840 -- 45,000.00  <i>Committee</i> <i>55-570</i>	45,000.00

A-4

NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE

NON-FEDERAL EXPENDITURES

425 2ND ST., NE.

WASHINGTON, DC 20002

SIGNET BANK

Virginia, VA

Virginia

1315

OCTOBER 31

19 94

68-408/580 1411

PAY \*\*FIFTY THOUSAND AND 00/100\*\*\*\*\* DOLLARS \$ \*\*50,000.00\*\*

TO  
THE  
ORDER  
OF

NATIONAL RIGHT TO LIFE  
419 7TH STREET, NW  
SUITE 500  
WASHINGTON, DC 20004  
ATTN: CAROL LONG

*WDD*  
*Q. Haywood*

⑈00001315⑈ ⑆056004089⑆ 652⑈016994⑈

NATIONAL REPUBLICAN  
SENATORIAL COMMITTEE  
NON-FEDERAL EXPENDITURES

DETACH AND RETAIN THIS STATEMENT  
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.  
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DELUXE - FORM WVCP-2 V-2

DATE	DESCRIPTION	AMOUNT
10/31/94	CONTRIBUTION - 7820000	50,000.00



# National Republican Senatorial Committee

SENATOR PHIL GRAMM  
CHAIRMAN

WILLIAM D. HARRIS  
EXECUTIVE DIRECTOR

A-45

November 2, 1994

Ms. Carol Long  
National Right to Life Committee  
419 7th Street N.W., Suite 500  
Washington, D.C. 20004

Dear Ms. Long:

Enclosed please find a \$50,000 contribution from the National Republican Senatorial Committee's non-federal account. The National Republican Senatorial Committee routinely makes contributions to charitable and tax-exempt organizations such as the National Right to Life Committee. This contribution to your organization should be used for good government activities that are consistent with your organization's not-for-profit character. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

Sincerely,

*Edwina Rogers*  
Edwina Rogers

NATIONAL REPUBLICAN  
SENATORIAL COMMITTEE  
NON-FEDERAL EXPENDITURES

DETACH AND RETAIN THIS STATEMENT  
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.  
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM WVCP-2 V-2

DATE	DESCRIPTION	AMOUNT
11/01/94	CONTRIBUTION - 7820000	50,000.00

**NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE**

**NON-FEDERAL EXPENDITURES**  
428 2ND ST., NE.  
WASHINGTON, DC 20002

# SIGNET BANK

Winston, VA

## Vergleichen

1316

NOVEMBER 1 1994

68-408/580 1411

PAY **\*\*FIFTY THOUSAND AND 00/100\*\*\*\*\*** DOLLARS \$ **\*\*50,000.00\*\***

TO  
THE  
ORDER  
OF

NATIONAL RIGHT TO LIFE  
419 7TH STREET, NW  
SUITE 500  
WASHINGTON, DC 20004

Wesel  
C. Bepierl

#00001316# :056004089: 652#0169944#

# National Republican Senatorial Committee

A-6

SENATOR PHIL GRAMM  
CHAIRMAN

WILLIAM D. HARRIS  
EXECUTIVE DIRECTOR

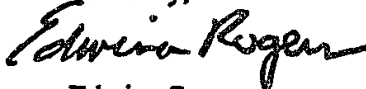
November 3, 1994

Ms. Carol Long  
National Right to Life Committee  
419 7th Street N.W., Suite 500  
Washington, D.C. 20004

Dear Ms. Long:

Enclosed please find a \$60,000 contribution from the National Republican Senatorial Committee's non-federal account. The National Republican Senatorial Committee routinely makes contributions to charitable and tax-exempt organizations such as the National Right to Life Committee. This contribution to your organization should be used for good government activities that are consistent with your organization's not-for-profit character. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

Sincerely,



Edwina Rogers  
General Counsel

RONALD REAGAN REPUBLICAN CENTER  
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

A-6

NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE  
NON-FEDERAL EXPENDITURES  
428 2ND ST., NE.  
WASHINGTON, DC 20002

SIGNET BANK  
Virginia

1317

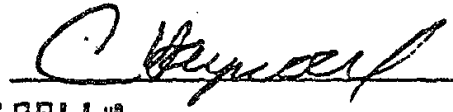
NOVEMBER 3 19 94

08-408/580 1411

PAY\*\*SIXTY THOUSAND AND 00/100\*\*\*\*\* DOLLARS \$\*\*60,000.00\*\*

TO  
THE  
ORDER  
OF

NATIONAL RIGHT TO LIFE  
419 7TH STREET, NW  
WASHINGTON, DC 20004



⑈00001317⑈ ⑈056004089⑈ 652⑈0169944⑈

NATIONAL REPUBLICAN  
SENATORIAL COMMITTEE  
NON-FEDERAL EXPENDITURES

DETACH AND RETAIN THIS STATEMENT  
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW  
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO RECEIPT DESIRED.

DELUXE - FORM WVCP-2 V-2

DATE	DESCRIPTION	AMOUNT
11/03/94	DONATION - CORPORATE DOLLARS	60,000.00

SENATORIAL COMMITTEE  
NON-FEDERAL EXPENDITURES

IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO RECEIPT DESIRED.

DELUXE - FORM WVCP-2 V-2

A-67


DATE	DESCRIPTION	AMOUNT
11/04/94	CONTRIBUTION -	15,000.00

Ms. Carol Long  
National Right to Life Committee  
419 7th Street N.W., Suite 500  
Washington, D.C. 20004

Dear Ms. Long:

Enclosed please find a \$15,000 contribution from the National Republican Senatorial Committee's non-federal account. The National Republican Senatorial Committee routinely makes contributions to charitable and tax-exempt organizations such as the National Right to Life Committee. This contribution to your organization should be used for good government activities that are consistent with your organization's not-for-profit character. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

Sincerely,

  
Edwina Rogers  
General Counsel

RONALD REAGAN REPUBLICAN CENTER  
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE

NON-FEDERAL EXPENDITURES

425 2ND ST., NE.

WASHINGTON, DC 20002

SIGNET BANK  
Virginia

1318

NOVEMBER 4 19 94

68-408/660 1411

PAY \*\*FIFTEEN THOUSAND AND 00/100\*\*\*\*\* DOLLARS \$\*\*15,000.00\*\*

7

NATIONAL RIGHT TO LIFE  
419 7TH STREET, NW  
WASHINGTON, DC 20004  
ATTN: CAROL LONG

TO  
THE  
ORDER  
OF

*Carol Long*

#00001318# :056001089: 652016944#

A 7

EXHIBIT C

Affidavit of  
David O'Steen

PAY TO THE ORDER OF  
**U.S. NATIONAL BANK OF OREGON**  
 FOR DEPOSIT ONLY  
 124-0008-258  
**OREGON RIGHT TO LIFE**

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE  
 RESERVED FOR FINANCIAL INSTITUTION USE

1250 46 10 02

'94 11

00410000 RCRC  
 0520-0027-6  
 080545844 10-11-94

OT 94 07

SIGNET BANK / NA  
 1230-0022-00807

21000554 10-11-94  
 001100000

000010000

#006035# #054000807# #667#004.2008#

#0003500000#

**NATIONAL RIGHT TO LIFE**  
**COMMITTEE, INC.**  
 1107 17th St. N.W., Suite 500  
 Washington, D.C. 20036  
 (202) 462-1240

*Oregon Right to Life*

DATE 10/19/94

AMOUNT \$5,000.00

MEMORANDUM FOR THE BOARD OF DIRECTORS

FROM: [Signature]

6035



**National**  
**RIGHT TO LIFE**  
**Committee, Inc.**

CHECK REQUEST NO. \_\_\_\_\_

Amount: \$35,000.00

Date: 10-4-94

Requested by: Cheri Reagan

Pay to: Green Right to Life

Memo to: \_\_\_\_\_

Address: \_\_\_\_\_

Address: \_\_\_\_\_

Cheri Reagan

Explanation: Grant to assist in fighting pro-euthanasia  
initiative in Oregon 24-876 25,000.00

22-844 - 5,000.00

57-890 5,000.00

Charge to: Performance Center No. \_\_\_\_\_

Account No. \_\_\_\_\_

Grant to Reagan

Account Name: \_\_\_\_\_

Date Check Required: \_\_\_\_\_

Note: When charging more than one account  
list each P.C. No. and Account No.,  
and amount to be charged on back of  
this form.

Approved by: \_\_\_\_\_

(Manager)

FF-1 (11/81)

OCT 04 1994  
BY Cheri Reagan  
(Executive Director)

PAY TO THE ORDER OF  
 UNITED NATIONAL BANK  
 PLAINFIELD, NJ 07061  
 10/20/1943  
 FOR DEPOSIT ONLY  
 NEW JERSEY COMMITTEE FOR  
 LIFE, INC.  
 1155113

DO NOT WRITE STAMP OR SIGN BELOW THIS LINE  
 RESERVED FOR FINANCIAL INSTITUTION USE

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 10/20/1943  
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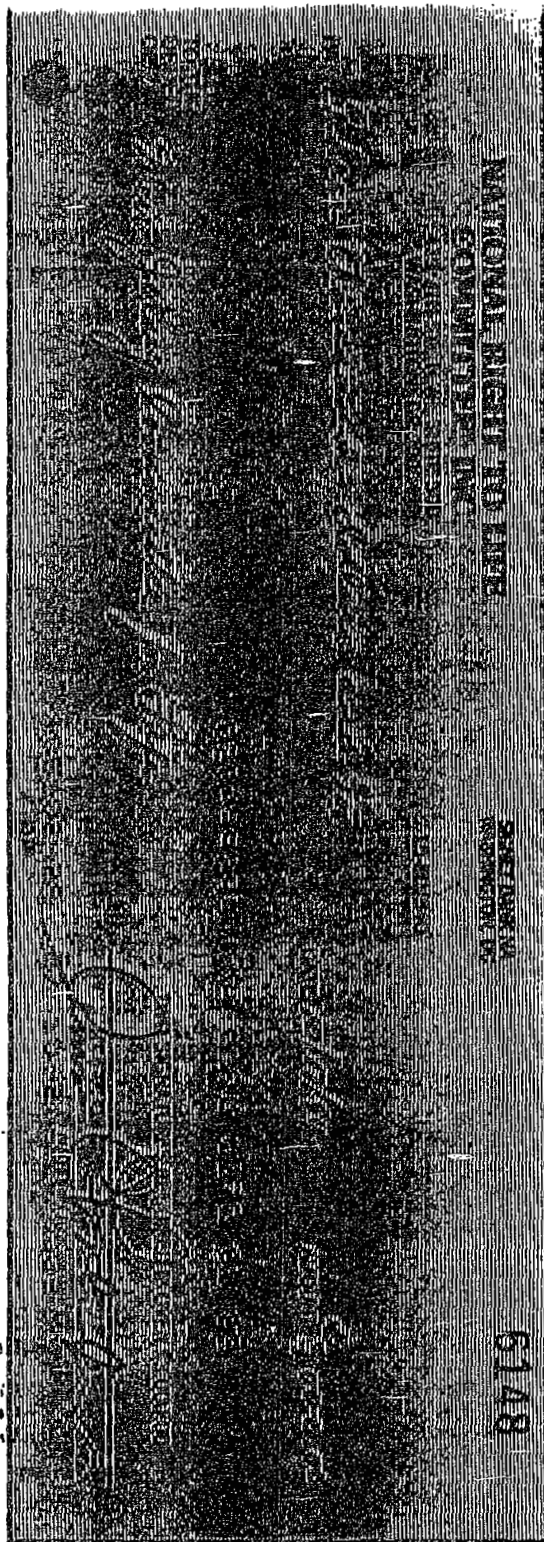
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06102429 10-20-94

10-20-94

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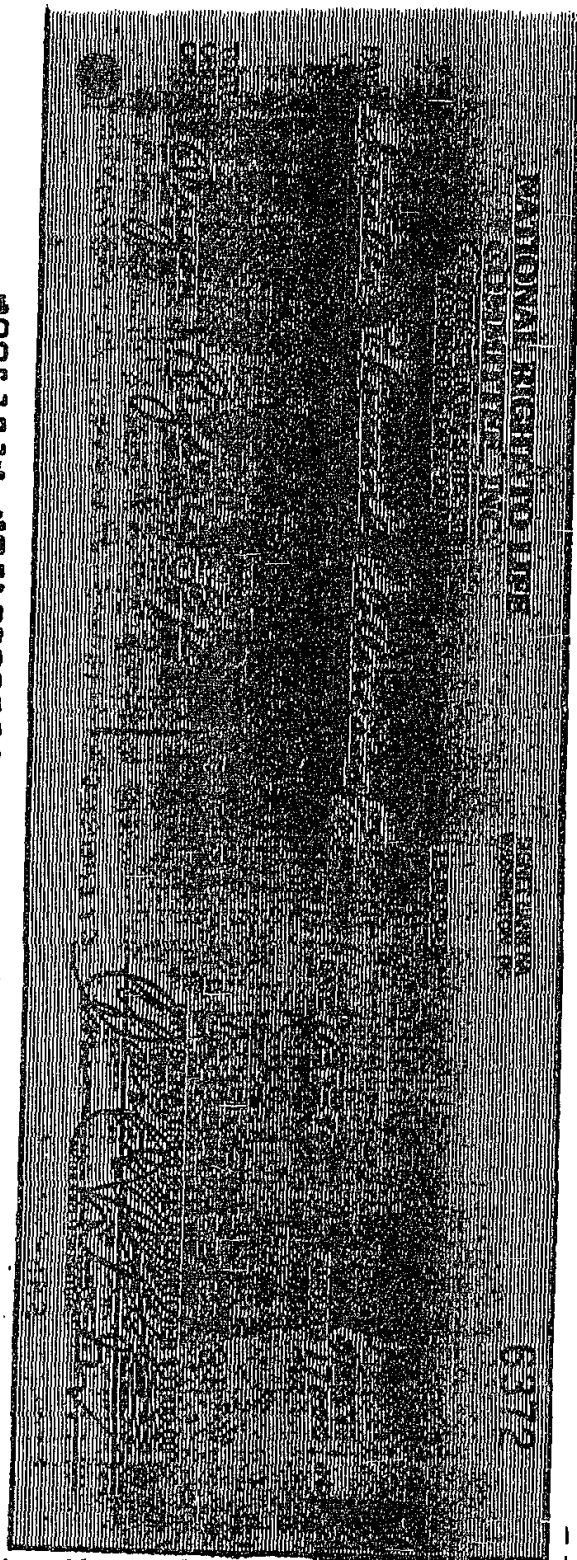


6148

NEW JERSEY  
 COMMITTEE FOR  
 LIFE, INC.

NATIONAL RIGHT TO LIFE  
 COMMITTEE, INC.

20.04.397.0350



**8 national  
RIGHT TO LIFE**

**committee, inc.**

CHECK REQUEST NO. \_\_\_\_\_

Amount: \$ 17,000.00 Date: 11/7/94

Requested by: David O'Steen

Mall to: Obleigh

Address: \_\_\_\_\_

Pay to: Oregon Right to Life

Address: \_\_\_\_\_

Explanation: Special CV project

Charge to: Performance Center No. \_\_\_\_\_

Account No. \_\_\_\_\_

Account Name: \_\_\_\_\_

Date Check Required: \_\_\_\_\_

FDX

11/11/94

Note: When charging more than one account  
list each P.C. No. and Account No.,  
and amount to be charged on back of  
this form.

OK 11/12

Approved by: \_\_\_\_\_

(Manager)

(Executive Director)

Pay to the Order of  
707 BANK OF AMERICA 707  
National Trust and Savings Association  
FOR DEPOSIT ONLY  
CALIFORNIA PRO LIFE COUNCIL, INC.  
07073-10070

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE  
RESERVED FOR FINANCIAL INSTITUTION USE\*

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11/68/94 0707310970 40

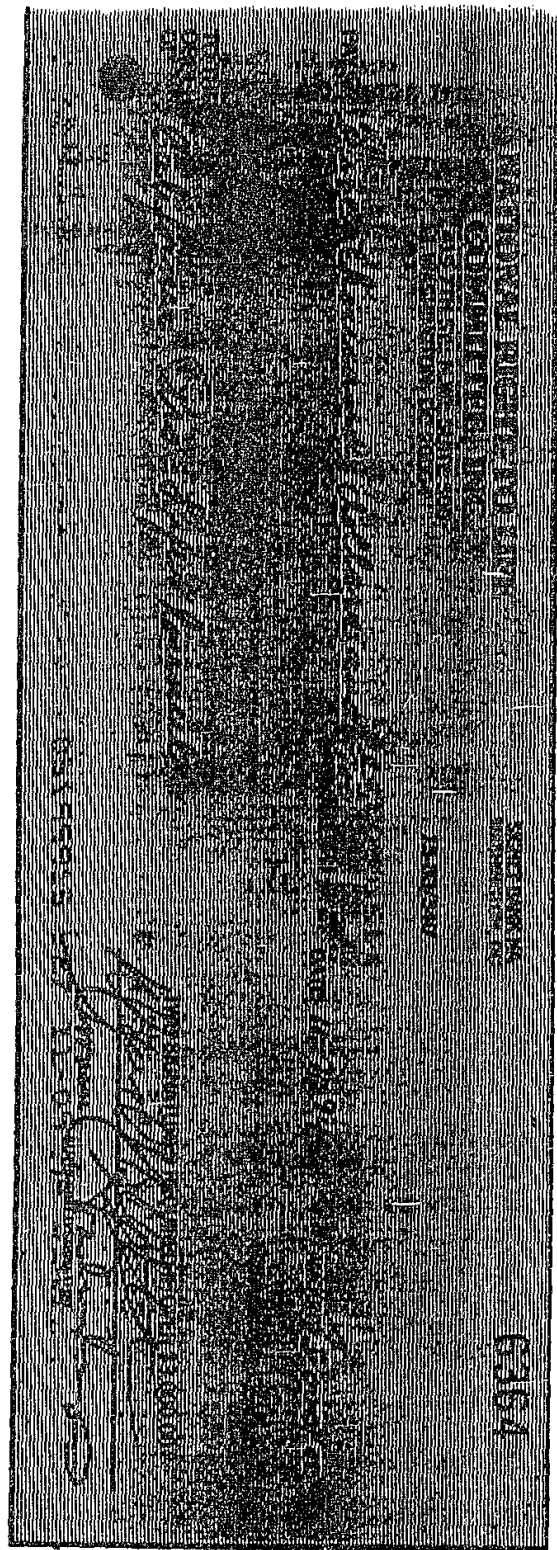
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SIGNET BANK - NA  
#98060007-1-05-

7-10-58

006364# 054000807# 557#004,2008#  
0000500000#



**2 National**  
**RIGHT TO LIFE**

**Committee, Inc.**

CHECK REQUEST NO. \_\_\_\_\_

Amount: \$ 5,000<sup>00</sup>

Date: 11/2/94

Requested by: David O'Steen

Pay to: California Pro-Life Center

Address: \_\_\_\_\_

Pay to: California Pro-Life Center

Address: 924 J St., Suite 1100

Sacramento, CA 95814

Explanation: Special C-V project

Project Director

Charge to: Performance Center No. 5-5011 Account No. 844

Account Name: \_\_\_\_\_

Date Check Required: \_\_\_\_\_

100%

Note: When charging more than one account list each P.C. No. and Account No., and amount to be charged on back of this form.

NOV - 7 1994

6364

Approved by: \_\_\_\_\_

(Manager)

By \_\_\_\_\_

(Executive Director)



**national  
RIGHT TO LIFE  
committee, Inc.**

Pay to: MCL

Address: 4349 Nicolet Ave  
Mpls MN 55409

Explanation: Special Projects - phone calls

Charge to: Performance Center No. 55

Account Name: \_\_\_\_\_

Date Check Required: Today

Approved by: \_\_\_\_\_  
(Manager)  
FF-1 (11/81)

CHECK REQUEST NO. \_\_\_\_\_

Amount: \$ 50.00  
~~24.94~~

Date: 11-4-94

Requested by: \_\_\_\_\_

Mail to: \_\_\_\_\_

Address: \_\_\_\_\_

Account No. 8290

Note: When charging more than one account  
list each P.C. No. and Account No.,  
and amount to be charged on back of  
this form.

[Signature]  
(Executive Director)

2025 RELEASE UNDER E.O. 14176



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TOTAL DISCOUNT AMOUNT OF CHECK		PAY TO THE ORDER OF <i>National Right to Life Cons</i> \$ <i>500.00</i> <i>Five hundred and no/100</i> DOLLARS 05148802 <i>Jackie Schmitt</i> <i>Mary Schmitt</i>		
120974010931002504 FRB MPLS 0910-0008-0 410309842 12-09-94 410309842 7373 7509 19		0000500000		

120974010931002504 WICHFIELD BANK & TRUST

FRB MPLS 0910-0008-0  
 CITY  
 410309842 12-09-94  
 410309842 7373 7509 19

05148802 12-09-94

ENDORSE HERE

FOR DEPOSIT ONLY  
 NATIONAL RIGHT TO LIFE COMM, INC.  
 THANK YOU & GOD BLESS YOU  
 Acct # 6670042032

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE  
 RESERVED FOR FINANCIAL INSTITUTION USE

EXHIBIT D

Affidavit of  
David O'Steen

-----  
CARD 1: GET OUT THE VOTE MESSAGE

Hello. Your vote in tomorrow's run-off Senate election is crucial.

(WHY-CH) Wyche Fowler supports an abortion-on-demand bill, which allows abortion for any reason, even on teenage girls without their parents' knowledge. (WHY-CH) Wyche Fowler has voted to allow tax funded abortion.

Paul (COVER-DELL) Coverdell supports Georgia's parental notice law and opposes the abortion-on-demand bill. Paul (COVER-DELL) Coverdell is against using tax dollars for abortion.

Please vote tomorrow. Thank you!

CODE AS DISPOSITION Y/PRESS F2 KEY IMMEDIATELY

COMMUNICATORS: (WHY-CH) CH pronounced as in Choo Choo

-----  
COPYRIGHT INFOCISION MANAGEMENT CORPORATION - NOVEMBER, 1992

COMMUNICATORS: DISPOSITION KEY:

A = ANSWERING MACHINES  
C = CHILD ANSWER (NO ADULT HOME)  
W = WRONG NUMBER AND SPECIAL OUTS  
Y = CONTACT

Hello. May I speak to \_\_\_\_\_?

I'm calling to remind you to vote on Tuesday in the U.S. Senate election.

There are now 4,300 abortions a day, and each abortion takes the life of a living human child.

**ANN WYNIA** supports abortion on demand, and **ANN WYNIA** supports using your tax dollars to pay for abortion.

**ROD GRAMS** is against abortion on demand, and **ROD GRAMS** opposes using your tax dollars to pay for abortion.

Your vote is important. Please vote on Tuesday. Thank you.

NOV-4-94 FRI 12:39PM OPTIMA DIRECT INC

PP.32

## SCRIPT FOR PENNSYLVANIA SENATE RACE

Hello, Mr./Mrs./Ms. \_\_\_\_\_ This is (first & last name) calling for the Pennsylvania Pro-Life Federation.

There are now more than 4,000 abortions a day and each abortion takes the life of a tiny human child.

As you may know, U.S. Senate candidate Rick Santorum is pro-life and opposes the use of our tax dollars to pay for abortion.

His opponent supports abortion on demand and tax funding to pay for abortion.

Your vote is important. Please vote on Tuesday.

God bless you and thank you for your support.

EXHIBIT E

Affidavit of  
David O'Steen

6343

**National  
RIGHT TO LIFE  
Committee, Inc.**

Amount: \$ 50,000 - Date: 11-3-94

Requested by: \_\_\_\_\_

Pay to: Optima Direct

Mailed to: \_\_\_\_\_

Address: 1000 Vermont Ave NW

Address: \_\_\_\_\_

Washington DC 20005

Explanation: MA phone calls - GO TV

Jul 10<sup>th</sup> 1993  
11/91 acf

Charge to: Performance Center No. 55

Account No. 840

Account Name: \_\_\_\_\_

Date Check Required: \_\_\_\_\_

Note: When charging more than one account list each P.C. No. and Account No., and amount to be charged on back of this form.

Approved by: \_\_\_\_\_

(Manager)

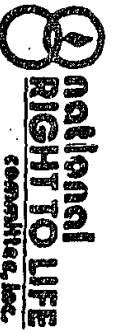
FF-1 (11/81)

Harold Hill  
(Executive Director)



EXHIBIT F

Affidavit of  
David O'Steen



419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004

IN PAYMENT FOR

15-80/540

12042

PAY Twenty Two Thousand eight Hundred Twenty and 5/100 DOLLARS

TO THE ORDER OF	DATE	CHECK NO.	SUB	ACT. NO.	CEN	CHECK AMOUNT
Planned Parenthood	12/15/93	12042	58	86092	820450	

1000 Cleveland Ave NW

Washington, DC 20005-0903

SIGNET BANK, D.C.

*[Signature]*

NO 12042

1054000000000000

156740042008

700092810507

PART OF

2000 463 40 02

**Optima**  
DIRECT, INC

November 9, 1994

To: David O'Steen

From: Andrew Baum

Re: Voter contact calls

David, this memo will provide you a complete cost accounting of the GOTV calls we made on your behalf. Thank you for providing Optima the opportunity to again work with you and all of our friends at Right to Life.

Original Selects:

194,895 contacts @ \$0.50 \$ 97,447.50

PA Pro-Life Federation:

92,425 contacts @ \$0.50 \$ 46,212.50

Governor Calls:

Calls for Millner in GA

22,421 contacts @ \$0.50 \$ 11,210.50

110,741 contacts @ \$0.50 \$ 55,370.50

Less GA Gov calls

&lt; \$ 11,210.50 &gt;

RTL Gov. Total

\$ 44,160.50

Sub Total

\$ 187,820.50

Less Deposit Payment

&lt; \$ 95,000.00 &gt;

Total Due Amount

\$ 92,820.50

We will send you an invoice for the balance due. I will send a check for \$789.50 to the Millner campaign for the balance of their \$12,000.

Please call if you have any questions.

FOR DEPOSIT ONLY

7 6  
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20

RECEIVED

4-30-71 45-50-51 (1743 3143)  
20 18 10



419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004

IN PAYMENT FOR  
INV. # 1060

15-80/540

11821

Pay Northwest eighty eight and 50/100

TO THE ORDER OF		DATE	CHECK NO.	ACCT NO.	CHECK AMOUNT
Omega Communications, Inc.		4-15-71	11821		9018.50

Omega Communications, Inc.  
215 215 215 215 215 215  
Pittsburgh, PA 15220-3509

SIGNATURE BANK, D.C.

05055832

27

*[Signature]*

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Omega Communications, Inc.  
Acacia Building #275  
875 Greentree Road  
Pittsburgh, PA 15220-3503  
412-937-0730

# Invoice

DATE

11/7/94

INVOICE #

1060

BILL TO:

National Right To Life Committee  
Attn: Carol Long  
419 7th Street NW  
Washington D.C. 20004

P.O. NUMBER

18505

TERMS

NET 15

PROJECT

QUANTITY

DESCRIPTION

RATE

AMOUNT

18,177

Voter Education Calls

0.50

9,088.50

Billing Period: November 4 through November 7, 1994

**TOTAL**

**9,088.50**

[illegible]



COMMUNICATIONS  
CORPORATION

Bill National Right To Life  
To: Committee  
419 7th Street NW, #500  
Washington, D.C. 20004

Date	Invoice
8 Nov 94	1603

BALANCE DUE: 3,011.20

PO Number	Terms	Project
	Due on recpt	PASEN

Quantity	Description	Rate	Amount
94.1	Get-out-the Vote Phone Calls	32.00	3,011.20
Calls completed November 4 & 6, 1994.		TOTAL:	3,011.20

02/13/95  
FOREST BANK ARIZONA  
122105278

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02/13/95

**HORNET BANK ARIZONA**  
**122105278**

**NATIONAL RIGHT TO LIFE  
COMMITTEE, INC.  
419 7TH ST., N.W., SUITE 500  
WASHINGTON, DC 20004**

**SIGNET BANK NA  
WASHINGTON, DC  
1-800-540**

4-3-5

7113

AMS: 1624 - 1626

MD5 Communication Log

Received of the Treasurer of the  
City of New York the sum of \$100.00  
for the purchase of the City of New York  
Bonds for the year 1900.

TWO SIGNATURES REQUIRED IF OVER \$2,000.00

05083214

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Bill National Right to Life PAC  
To: Attn: Carol Long  
419 7th Street NW, #500  
Washington, D.C. 20004

Date	Invoice
15 Nov 94	1626

BALANCE DUE: 5,232.00

PO Number	Terms	Project
	Due on recpt	PASEN

Quantity	Description	Rate	Amount
163.5	Get-out-the Vote Phone Calls	32.00	5,232.00
Calls completed November 7, 1994.		TOTAL:	5,232.00



November 4, 1994

Dr. David O'Steen  
NATIONAL RIGHT TO LIFE  
419 7th Street, NW  
Suite 402  
Washington, DC 20004

LETTER OF AGREEMENT

This Agreement, when signed by authorized representatives of each of our organizations, constitutes the Agreement between NATIONAL RIGHT TO LIFE COMMITTEE ("RTL") and OPTIMA DIRECT, INC. ("ODI") for outbound telemarketing and attendant support services that ODI will provide for RTL.

RTL and ODI hereby agree to the following:

1. SERVICES

ODI shall provide the following services, based upon RTL provided guidelines for the telemarketing program described in this agreement:

a. ODI will manage and monitor outbound telemarketing campaign(s) for RTL. These campaigns will be a get-out-the-vote telemarketing program. Optima will complete these between 11/04/94 and 11/08/94.

At it's contracted service bureaus, ODI will select, train, and manage telephone sales representatives (TSR's) and supervisory personnel. ODI will be responsible for adhering to RTL's guidelines in a timely and professional manner.

b. ODI will be responsible for the provision of support services for telemarketing including any necessary data processing.

c. ODI will provide a Program Manager for this RTL campaign, who will be responsible for the day-to-day program management and daily reporting to RTL, in addition to being generally available from 9 a.m. to 6:30 p.m. daily for consultation.

2. SCRIPTS

The telemarketing script will be provided by RTL.

Dr. David O'Steen

**Optima**  
DIRECT, INC

Dr. David O'Steen  
Letter of Agreement  
November 4, 1994  
page two of five

### 3. LIST PREPARATION

All list preparation and associated costs, including the delivery of the lists in an appropriate format, 9-track magnetic tape is the responsibility of RTL.

### 4. CONFIDENTIALITY

During the course of providing services described in this Agreement, ODI will come into possession of proprietary material and confidential information that pertain to RTL's business. Such ODI recognizes the proprietary nature of all information provided by RTL, and as such will keep confidential all information pertaining to RTL's campaign, strategies, lists, results and materials. All such materials will not be shared or provided to any third party, except in the case of courier services and subcontractors whose services directly pertain to the approved conduct of the campaign. Any materials and all copies of materials deemed proprietary will be returned to the provider within 72 hours of receipt of a written request.

ODI's obligation to maintain the confidentiality of obtained confidential information will survive the termination of this Agreement. ODI shall not be held responsible for similar information already in the public domain or information that enters the public domain through no fault of ODI.

Service providers contracted by ODI shall be contracted to adhere to the confidentiality requirements of paragraph 4 of this agreement for each and every RTL campaign.

### 5. INVOICING AND PAYMENT TERMS

ODI will be paid 50% of the estimated cost of the program before calling has commenced. The remainder is due upon the completion of the program. Optima will not provide response data to RTL until final payment is paid in full.

**Optima**  
DIRECT, INC

Dr. David O'Steen  
Letter of Agreement  
November 4, 1994  
page three of five

#### 6. FEES

Set-up Fee	No Charge
Daily Account Management	No Charge
Standard Reporting	No Charge
Creative/Script Writing	No Charge
Phone contact	\$ 0.50 per contact*

\* A contact is defined as a presentation of the phone script, whether complete or incomplete, to any adult who answers the phone. Immediate refusals (those prospects who provide no answer to the first question) are NOT contacts.

#### 7. FILE OWNERSHIP

Any files provided to ODI by RTL are the property of RTL and will not be made available to any third party without the written consent of RTL.

The files will be returned to RTL within 48 hours of receipt of a written request, except in the case of non payment.

#### 8. TERM

The term of this Agreement is 1 year from the date of execution. Either party may terminate this Agreement with 30 days written notice to the other. Should either party terminate this Agreement with or without cause, RTL shall remain obligated to pay for all services performed prior to the effective date of termination.

2000-10-10 10:00:00

**Optima**  
DIRECT, INC

Dr. David O'Steen  
Letter of Agreement  
November 4, 1994  
page four of five

#### 9. INDEMNIFICATION

ODI indemnifies and holds harmless RTL and its officers, employees and directors from all claims and liabilities that arise from or may be attributable to errors, omissions or fault of ODI and which are not caused by RTL. RTL indemnifies and holds harmless ODI and its officers, employees and directors from all claims and liabilities that arise from or may be attributable to errors, omissions or fault of RTL and which are not caused by ODI.

#### 10. INDEPENDENT CONTRACTOR

Both parties to this Agreement are independent contractors. Nothing in this Agreement implies or may be construed to create a partnership, joint venture, employer-employee relationship between ODI and RTL within the meaning of any federal, state or local law.

#### 11. FORCE MAJEURE

Neither party shall be responsible for delays or interruptions in service which result directly or indirectly from acts of God, civil or military authority, accidents, fires, the elements or any other similar or different causes beyond the reasonable control of ODI or RTL.

#### 12. GOVERNING LAW

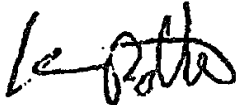
This Agreement is made in accordance with and governed by the laws of the State of Virginia.

**Optima**  
DIRECT, INC

Dr. David O'Steen  
Letter of Agreement  
November 4, 1994  
page five of five

David, if this letter accurately states the terms of our agreement, please sign both copies and return on to me. Thank you and we look forward to doing a great job for you.

FOR OPTIMA DIRECT, INC.:



Kevin Potter  
Executive Vice President

11/4/94  
Date

FOR NATIONAL RIGHT TO LIFE COMMITTEE:

  
Signature

11/4/94  
Date

David O'Steen  
Name

Ex Dir  
Title



## **National Right to Life Committee**

### **"Get Out and Vote" Telemarketing Proposal**

**November 4, 1994**

#### **Specific Recommendations**

Omega Communications has been asked to conduct a telemarketing campaign on a list supplied by the Pennsylvania Pro-Life Federation to urge donors to "get out and vote" in the November 8th election.

This campaign will begin on Friday, November 4, 1994 and will end on Monday, November 7, 1994. Omega anticipates contacting approximately 20,000-25,000 current Federation donors during the campaign.

During the calling, Omega would utilize its standard Integrated Donor Management (IDM) approach which includes the following:

- A short script approach with non-scripted objectives
- A generation of donor comments, specifically pro-choice and/or "do not call"
- A "thank you" script for do not call dispositions
- Supervising/monitoring ratio of 8 to 1

#### **Costs and Services**

##### **Billable Calls**

Omega charges on a per billable contact basis. The following responses represent billable contacts:

- A completed call with full script
- Do not call
- Deceased

Charges for these calls will be billed \$.50 per completed call.

Acacia Bldg., Suite 275  
875 Greentree Road  
Pittsburgh, PA 15220  
800-634-0192  
Fax 412-937-0431

**Included Services**

Additionally, the cost per call includes all of the following services:


- Daily call reports and campaign status
- Post campaign processing and call reports

Omega will also provide full integrated donor management consulting at any point during the campaign. This includes specific campaign advice and support as well as annualized development plans for all donor types and fund raising methods.

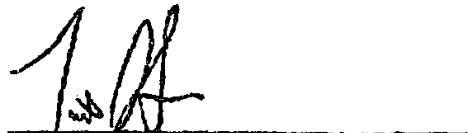
**Authorization**

To authorize Omega to begin calling and to indicate acceptance of this agreement, please sign below and return a copy of this agreement to us. Either the National Right to Life Committee, Omega, or Pennsylvania Pro-Life Federation reserve the right to stop calling at any time, for any reason.

We look forward to making these calls on your behalf.

  
David N. O'Steen Ph. D.  
National Right to Life Committee

Date: 11/8/94

  
Timothy D. Logan, CFRE  
President  
Omega Communications, Inc.

Date: 11/7/94



EXHIBIT H

Affidavit of  
David O'Steen



A - 9

INFOCISION MANAGEMENT CORPORATION  
325 Springside Drive, Akron, Ohio 44333  
(216) 668-1400

*Information/Decision Management*

DAVID O'STEEN  
NATIONAL RIGHT TO LIFE  
419 7TH ST NW SUITE 500  
WASHINGTON DC, 20004

INVOICE : 22100  
November 25, 1992

TELEMARKETING DIVISION	# of Units	Unit Price	Sub Total
NATIONAL RIGHT TO LIFE Georgia Run-Off Election RL431 (C-4) Telephone Contacts Combined Billing Invoice for Telemarketing Services Completed 11/18/92 to 11/24/92			
Completed Calls	34282	0.50	17,141.00
Training Hours	14	12.00	168.00
Computer Charges			63.75
NET AMOUNT DUE THIS INVOICE .....			\$17,372.75

PAYMENT IS DUE IN OUR OFFICE NO LATER THAN 14 DAYS FROM THE DATE OF THIS INVOICE. ANY PAYMENT NOT RECEIVED WITHIN 30 DAYS OF THE INVOICE DATE WILL INCUR A 1 1/2% MONTHLY FINANCE CHARGE, AND 1 1/2% EACH 30 DAYS THEREAFTER ON ANY OUTSTANDING BALANCE. PLEASE REMIT PAYMENT TO: INFOCISION MANAGEMENT

SP  
Projects

419 7th Street, N.W.  
Suite 600  
Washington, D.C. 20004

**NEW PAYMENT FOR**

22100

15-80/540

0650

PAY SEVENTEEN THOUSAND THREE HUNDRED SEVENTY TWO 758

TO THE ORDER OF		DATE		CHECK NO.		CHECK AMOUNT	
IN FOCUSION MANAGEMENT		6-28-01		500816		77372.00	

3325 Springside Drive

AKRON OH 44333

**SIGVET BANK** WASHINGTON, D.C.

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3004

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INFORMATION  
FOR THE  
2-04-1  
ARSON  
SOCIETY NATH  
PAY TO THE

94-2211  
 ROBERT EATL BL.  
 3026 DUNDAS ST.  
 GREECE ON 4115  
 9-0410  
 0103894

EXHIBIT G

Affidavit of  
David O'Steen



A - 9

INFOCISION MANAGEMENT CORPORATION  
325 Springside Drive, Akron, Ohio 44333  
(216) 668-1400

*Information/Decision Management*

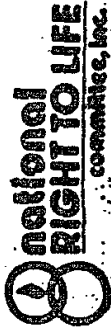
DAVID O'STEEN  
NATIONAL RIGHT TO LIFE  
419 7TH ST NW SUITE 500  
WASHINGTON DC, 20004

INVOICE : 22100  
November 25, 1992

TELEMARKETING DIVISION	# of Units	Unit Price	Sub Total
NATIONAL RIGHT TO LIFE Georgia Run-Off Election      RL431 (C-4) Telephone Contacts Combined Billing Invoice for Telemarketing Services Completed 11/18/92 to 11/24/92			
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SP  
Projects



419 7th Street, N.W.  
Suite 500  
Washington, D.C. 20004

IN PAYMENT FOR

#22100

15-80/1540

6590

PAY SEVENTEEN THOUSAND THREE HUNDRED SEVENTY TWO DOLLARS

IN THE PRESENCE OF  
IN SOCIATION MANAGEMENT  
225 SPRINGSIDE DRIVE  
AKRON, OH 44337  
SIGVET BANK, INC.  
WASHINGTON, D.C.  
00065900 005100008070 667-0042008W  
000017371751

325 SPRINGSIDE DRIVE  
AKRON, OH 44337  
SIGVET BANK, INC.  
WASHINGTON, D.C.  
00065900 005100008070 667-0042008W  
000017371751

PAY TO THE  
SOCIETY NATI  
AKRON, OH  
FOR THE  
INFORMATION  
20

90410  
010384  
JA 3 11  
SOCIETY NATI  
AKRON, OH  
GATE 05 14116

EXHIBIT I

Affidavit of  
David O'Steen

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[REDACTED]

[REDACTED]  
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